



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 2  
290 BROADWAY  
NEW YORK, NY 10007-1866

APR 16 2008

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Mr. Jeffrey A. Leed  
Leed Environmental, Inc.  
Van Reed Office Plaza  
2209 Quarry Drive, Suite C-35  
Reading, PA 19609

Re: Comments on the September 2007 Groundwater Monitoring Report, Revised  
March 31, 2008.  
NL Industries Superfund Site, Pedricktown, NJ

Dear Mr. Leed:

The United States Environmental Protection Agency (EPA) has reviewed the March 2008 revision of the September 2007 Groundwater Monitoring Report (March GWMR) which was submitted to EPA via e-mail on March 31, 2008. The March GWMR was to address EPA's March 13, 2008 comments on Revision 2 of the original September 2007 version of this GWMR. The March GWMR summarizes the results of groundwater sampling activities conducted in April 2007 by CSI Environmental, LLC at the NL Industries, Inc. Superfund Site.

EPA has three comments regarding the March GWMR as indicated below:

1. *Page 11, 4th paragraph, 1st sentence:* CSI states that the 2004 groundwater data is provided in Table 4; however, this data is neither discussed in the groundwater monitoring report nor included in Figures C-1 and C-2. Given that the 2004 data was not rejected, it should be included in the figures and discussed in the text of the March GWMR. The discussion should include the reasons why CSI believes the data is anomalous, as presented in CSI's March 31, 2008 Response Letter to EPA.

Accordingly, with the modifications mentioned above, the first sentence in the fourth paragraph of page 11 should be deleted and the reference to Table 4 should be included in the new discussion section of the 2004 data.

2. *Tables C-1 & C-2, Page 11 4th & 5th paragraphs:* Since the 2007 data is compared with 1983 data in these paragraphs, please include the 1983 calculations in the tables if available.

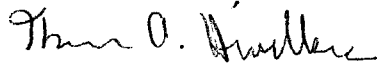
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3. *Page 9 Section 4.1, last sentence and Page 12, 4<sup>th</sup> paragraph, last sentence:* The term "apparent" should be changed to "potential" in all instances where it is used to describe the groundwater flow divide.

Please update the March GWMR to reflect the comments above and resubmit the amended report via e-mail to EPA within 14 calendar days of receipt of this letter. If you have further questions or concerns regarding EPA's comments on the March 2008 revision of the September 2007 GWMR, please do not hesitate to contact me.

Sincerely yours,



Theresa Hwilka, Project Manager  
Southern New Jersey Remediation Section

cc: Steve Maybury, NJDEP

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Ms. Theresa Hwilka  
New Jersey Remediation Branch  
USEPA - Region 2  
290 Broadway, 19th fl  
New York, NY 10007-1866

letter dated 4/16/08



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Jeffrey A. Leed  
Leed Environmental, Inc.  
Van Reed Office Plaza  
2209 Quarry Drive, Suite C  
Reading, PA 19609


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